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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON

WILLAMETTE RIVERKEEPER,

Plaintiff,

v.

CITY OF ALBANY; *et al.*,

Defendants.

NO. 6:20-cv-01760-AA

Joint Notice of Settlement and Lodging  
of Proposed Consent Decree Pending  
DOJ Review

1 Plaintiff Willamette Riverkeeper and Defendants City of Albany, *et al.*, hereby provide notice  
 2 to the Court that the Parties have settled the above-captioned matter and lodge the attached Proposed  
 3 Consent Decree, pending the conclusion of the required 45-day review period mandated by the Clean  
 4 Water Act and its regulations. 33 U.S.C. § 1251 *et seq.* and 40 C.F.R. § 135.5(b).

5  
 6 On March 8, 2022, Plaintiff's undersigned counsel sent copies of the Proposed Consent Decree  
 7 to the Administrator, Environmental Protection Agency ("EPA"), as well as to the United States  
 8 Department of Justice ("DOJ"), Citizen Suit Coordinator, Environment and Natural Resources  
 9 Division Law and Policy Section, and the Acting Administrator of EPA Region 10 pursuant to the  
 10 requirements of 40 CFR § 135.5.

11 The citizen suit provision of the Clean Water Act provides that no consent judgment shall be  
 12 entered in an action in which the United States is not a party prior to 45 days following the receipt of  
 13 a copy of the proposed consent judgment by the Attorney General and the EPA Administrator. 33  
 14 U.S.C. § 1365(c)(3). The Parties submit the attached Proposed Consent Decree to the Court at this  
 15 time for informational purposes only. At the expiration of the 45-day review period set forth in 33  
 16 U.S.C. § 1365(c)(3), the Parties will jointly move the Court to enter the Proposed Consent Decree.

17  
 18 DATED this 8th day of March, 2022.

19 Respectfully submitted, by:

20  
 21 s/ Elisabeth A. Holmes  
 22 Elisabeth A. Holmes (OSB No. 120254)  
 Willamette Riverkeeper

23 s/ Bryan Telegin  
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